1	Jane G. Kearl (CA 156560) Colin C. Holley (CA 191999)	
2	WATT, TIEDER, HOFFAR & FITZGERALD, L.	L.P.
3	2040 Main Street, Suite 300 Irvine, CA 92614	
4	Telephone: 949-852-6700 Facsimile: 949-261-0771	
5	Email: jkearl@watttieder.com cholley@watttieder.com	
6	Attorneys for Creditor Barnard Pipeline, Inc.	
7	, - T	BANKRUPTCY COURT
8		TRICT OF CALIFORNIA
9	SAN FRAN	CISCO DIVISION
10	In re:	Bankruptcy Case
11	PG&E CORPORATION,	Case No. 19-30088 (DM) Chapter 11
12	-and-	(Lead Case)
	PACIFIC GAS AND ELECTRIC	(Jointly Administered)
13	COMPANY,	
14	Debtors.	
15	☐ Affects PG&E Corporation	NOTICE OF CONTINUED PERFECTION OF MECHANICS LIEN PURSUANT TO 11
16	☐ Affects Pacific Gas and Electric Company	U.S.C. § 546(b)(2)
17		Tehama County (Lien 2019001052)
18	* All papers shall be filed in the Lead Case, No. 19-30088 (DM)	
19	170. 19-30000 (DIVI)	
20		
21	Barnard Pipeline, Inc. ("Barnard"), b	y and through its undersigned counsel, hereby gives
22	notice of continued perfection of its mechanic	cs lien under 11 U.S.C. § 546(b)(2), as follows:
23	Barnard has provided and deli	vered labor, services, equipment, and/or materials for
24	the construction and improvements of project	s located in the County of Tehama, State of California
25	(the "Property"), the legal description for whi	ich is set forth in the Claim of Mechanics Lien, a true
26	copy of which is attached hereto as Exhibit A	A (the "Mechanics Lien").
27	2. The Property is owned by P	PG&E Corporation and/or Pacific Gas and Electric
28	Company (collectively, the "Debtors"), which	h filed voluntary petitions for relief under Chapter 11
ER.		

of Title 11 of the United States Code (the "Bankruptcy Code") on January 29, 2019 (the "Petition Date").

- 3. On January 28, 2019, before the Petition Date, Barnard properly and timely recorded its Mechanics Lien under California Civil Code § 8400, *et seq.* in the Official Records of Tehama County, State of California.
- 4. Through January 28, 2019, the amount owing to Barnard subject to its Mechanics Lien is at least \$512,334.10, exclusive of accruing interest and other charges, and additional amounts which have continued and are continuing, to accrue after the Petition Date.
 - 5. California Civil Code § 8460(a) provides that:

The claimant shall commence an action to enforce a lien within 90 days after recordation of the claim of lien. If the claimant does not commence an action to enforce the lien within that time, the claim of lien expires and is unenforceable[.]

- 6. Pursuant to California Civil Code § 8460, an action to enforce a lien must be commenced within 90 days after recordation of the claim of lien. However, section 362 of the Bankruptcy Code automatically stays Barnard from filing a state court action to enforce its mechanics lien. See 11 U.S.C. § 362.
 - 7. Section 546(b)(2) of the Bankruptcy Code provides that when applicable law

... requires seizure of such property or commencement of an action to accomplish such perfection, or maintenance or continuation of perfection of an interest in property; and ... such property has not been seized or such an action has not been commenced before the date of the filing of the petition; such interest in such property shall be perfected, or perfection of such interest shall be maintained or continued, by giving notice within the time fixed by such law for such seizure or such commencement.

See 11 U.S.C. § 362; see also Village Nurseries v. Gould (In re Baldwin Builders), 232 B.R. 406, 410-11 (9th Cir. 1999); Village Nurseries v. Greenbaum, 101 Cal.App.4th 26, 41 (Cal. Ct. App. 2002).

8. Accordingly, Barnard hereby provides notice of its rights as a lienholder in the Property pursuant to California's mechanics lien law. Barnard is filing and serving this notice to perfect, preserve, maintain, and continue the perfection of its lien and its rights in the Property to

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comply with the requirements of California state law, 11 U.S.C. §§ 362(a), 362(b)(3), and 546(b)(2), and any other applicable law. This notice constitutes the legal equivalent of having recorded a mechanics lien in the recorder's office for the county where the Property is located and then having commenced an action to foreclose the lien in the proper court. By this notice, the Debtors and other parties in interest are estopped from claiming that the lawsuit to enforce Barnard's mechanics lien was not timely commenced pursuant to applicable state law. Barnard intends to enforce its lien rights to the fullest extent permitted by applicable law. The interests, perfected, maintained, or continued by 11 U.S.C. § 546(b)(2) extend in and to the proceeds, products, offspring, rents, or profits of the Property.

- 9. The filing of this notice shall not be construed as an admission that such filing is required under the Bankruptcy Code, the California mechanics lien law, or any other applicable law. In addition, Barnard does not make any admission of fact or law, and Barnard asserts that its lien is senior to and effective against entities that may have acquired rights or interests in the Property previously.
- 10. The filing of this notice shall not be deemed to be a waiver of Barnard's right to seek relief from the automatic stay to foreclose its mechanics lien and/or a waiver of any other rights or defenses.

11. Barnard reserves all rights, including the right to amend or supplement this notice.

Dated: April _____, 2019

WATT, TIEDER, HOFFAR & FITZGERALD, L.L.P.

By:

Jane G. Kear (CA 156560) Colin C. Holley (CA 191999) 2040 Main Street, Suite 300

Irvine, CA 92614

Telephone: 949-852-6700 Facsimile: 949-261-0771

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Attorneys for Creditor Barnard Pipeline, Inc.

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26

CERTIFICATE OF SERVICE

Jane G. Kearl

28
WATT, TIEDER,
HOFFAR &

IRVINE

FITZGERALD, L.P. attorneys at Case: 19-30088 Doc# 1443 Filed: 04/15/19

- 4 - NOTICE OF CONTINUED PERFECTION OF Entered: 04715/1914 148.08 PROPERTY OF 11 U.S.C. §

WATT, TIEDER, HOFFAR &

TRVINE

Recording requested by: Barnard Pipeline, Inc.

And when recorded mail this document to:

Jane G. Kearl, Esq. Robert C. Shaia, Esq. Watt, Tieder, Hoffar & Fitzgerald, LLP 2040 Main Street, Suite 300 Irvine, CA 92614 Doc # 2019001052
Page 1 of 3
Pate: 1/28/2019 10:42A
Recording Requested By:
GENERAL PUBLIC
Filed & Recorded in Official Records
of TEHAMA COUNTY
JENNIFER A. VISE
COUNTY CLERK & RECORDER
Fee: \$20.00

For recorder's use

MECHANICS' LIEN (Cal. Civ. Code § 8416, et seq.)

1. BARNARD PIPELINE, INC. ("Claimant") claims a mechanics lien for the labor, services, equipment and/or materials described in paragraph 2, furnished for a work of improvement on that certain real property located in the City of Corning, County of Tehama, State of California, and more particularly described as:

All right, title and interest of Pacific Gas and Electric Company ("PG&E") in all easements and all improvements, structures, and pipelines therein, in or on which Claimant provided labor, services, equipment, and/or materials as set forth in paragraph 2, including, specifically, without limitation, all right, title and interest of PG&E in improvements, structures and pipelines located approximately at 6315 Rawson Rd., Corning, CA 96021 (APN 067-070-011) – Olive Orchard land.

- 2. After deducting all just credits and offsets, the sum of \$512,334.10 together with interest at the rate of 10% per annum from January 22, 2019, is due Claimant for the following: labor, services, equipment and/or materials for installation of approximately 90 feet of precast concrete box culvert and water diversion, and related construction work performed under the Alliance Agreement Contract between Claimant and PG&E and Contract Work Authorization No. C12107, or as otherwise requested by PG&E.
- 3. Claimant furnished the labor, services, equipment and/or materials at the request of: PG&E.
- 4. The name and address of the owner(s) or reputed owner(s) of the real property is/are: PG&E, 77 Beale Street, 32nd Floor, San Francisco, CA 94105.

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5. Claimant's address is: 701 Gold Avenue, Bozeman, MT 59715.

Dated January ZZ, 2019

BARNARD PIPELINE, INC.

Zach Bowler, Vice Presi

VERIFICATION

I, Zach Bowler, am the Vice President of Claimant on the foregoing Mechanics Lien and am authorized to make this verification for and on its behalf. I have read the foregoing Mechanics Lien and know the contents of the Mechanics Lien to be true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated January 22, 2019

Zach Bowler Vice President

NOTICE OF MECHANICS LIEN

ATTENTION!

Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.

The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek a sale of your property in order to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.

BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS STATE LICENSE BOARD WEB SITE AT www.cslb.ca.gov.

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PROOF OF SERVICE

I, Julie Benton, declare:

I am employed in the County of Orange, State of California. I am over the age of 18 years and not a party to the within action. My business address is 2040 Main Street, Suite 300, Irvine, California 92614-6232.

On January 23, 2019, I served □ the originals ☒ true copies of the following document(s) described as MECHANICS LIEN and NOTICE OF MECHANICS' LIEN on the interested parties in this action, by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at Irvine, California addressed as set forth below:

Pacific Gas & Electric Company (PG&E) 77 Beale Street, 32nd Floor San Francisco, CA 94105

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 23, 2019, at Irvine, California.

Julie Benton

WATT, TIEDER,
HOFFAR &
FITZGERALD, L.L.P.

PROOF OF SERVICE

ATTORNEYS AT LAW alse: 19-30088 Doc# 1443 Filed: 04/15/19 Entered: 04/15/19 14:48:05

THE COUNTY OF TH	TO SELECT THE PROPERTY OF THE PERSON OF THE	THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER.	AND SECOND SECOND	The Person Name of Street, or other Designation of the last of the	The same of the last of the la				-	EAdler@IneAdlerrim.com
Counsel for for Mirna Trettevik, including other Fire		Attn: E. Elliot Adler, Geoffrey E. Marr,	anz West Broadway	Suite 860	San Diego CA		92101	619-531-8700	619-342-9500 b	gemarr59@hotmail.com bzummer@TheAdlerFirm.com
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_			601 West Fifth Street, Suite		Los Angeles	Ç	90071	213-688-9500	213-627-6342 e	evelina gentry@akerman.com
		Attn: JOHN E, MITCHELL and YELENA	2001 Ross Avenue, Suite				75201	214-720-4300	214-981-9339 jo	john.mitchell@akerman.com
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	Akin Gump Strauss Hauer & Feld LLP	Attn: Ashley Vinson Crawford	580 California Street	oner aine	ľ		B0067	310-229-1000	310-229-1001 d	dsimonds@akingump.com
	Akin Gump Strauss Hauer & Feld LLP	Attn: David P. Simonds	1999 Avenue of the stars	Suite BAA						mstamer@akingump.com dizengoff@akingump.com
Counsel to the Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company A	Akin Gump Strauss Hauer & Feld LLP	Dizengoff, David H, Botter	One Bryant Park		New York	NY Y	10036	212-872-1000	2 7001-7/8-717	shiggins@andrewsthornton.com
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Counsel for BOKF, NA, solely in its capacity as		Attn: Andrew I. Silfen, Beth M.	1301 Avenue of the	42nd Floor	New York	NY	10019	212-484-3900	212-484-3990	Jordana Renert@arenttox.com
Counsel for Genesys Telecommunications Laboratories	Arant Fox LIP	Attn: Andy S. Kong and Christopher K.S Wong	555 West Fifth Street	48th Floor	Los Angeles	S	90013-1065	213-629-7400	213-629-7401	christopher.wonp@arentfox.com
NA, solely in its capacity as		Attn: Aram Ordubesian	555 West Fifth Street	48th Floor	Los Angeles	S	90013-1065	213-629-7400	213-629-7401	Aram Ordubeglan@arenflox.com brian.lohan@arnoldporter.com
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	d & Porter Kaye Scholer LLP	Artn: James W. Grudus, Esq.	One AT&T Way, Room		er .	N	07921	908-234-3318	/cro-cr3-308	Danette Valdez@doj.ca.gov
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1_	Attorney General of California	PADILLA, and JAMES POTTER	Same Suude utnos 00E	Suite Troop		3	50501	567-889-0182		marthaeromerolaw@gmail.com
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or NRG Energy Inc., Cleanway Energy, Inc.,	Baker Botts L.L.P.	Attn: C. Luckey McDowell, lan E. Roberts, Kevin Chiu	2001 Ross Avenue	Suite 1000	Dallas	Z	75201	214-953-6500		ian.Koberts@easerBotts.com Kevin.Chiu@BakerBotts.com
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IRENCO Limited and Louisiana Energy Services, LLC	Ballard Spahr LLP	Attn: Craig Solomon Ganz, Michael S.			D D D D D D D D D D D D D D D D D D D	Δ7	R5004-2555			myersms@ballardspahr.com
scovery Hydrovac	BALLARD SPAHR ILP	Myers	1 East Washington Street	11th Floor	Wilmington	DE I	19801	302-252-4428	410-361-8930	-
RENCO Limited and Louislana Energy Services, LLC	Ballard Spahr LLP	Attn: John McCusker	Mail Code: NY1-100-21-01		New York	ΥY	10036	646-855-2464		issummy@baronbudd.com
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Public Entities Impacted by the Wildfires	Baron & Budd, P.C.	Attn: Terry Higham Thomas E.	350 South Grand Avenue,						212 675 1832	
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Counsel for Dan Clarke	BELVEDERE LEGAL, PC		1777 Borel Place	Suite 314	Sell metter	5		707.707	302-442-7012	_
Counsel for Infanys Limited, Counsel for ACRT, Inc.	LIP CONTRACTOR OF THE PROPERTY		222 Delaware Avenue	Suite 801	Wilmington	5	19001			
the informal imited Councel for ACRT Inc.	BENESCH, FRIEDLANDER, COPLAN & ARONOFF	Attn: Krista M. Enns	555 California Street	Suite 4925	San Francisco	2 2	94104	415-659-7924	949-313-5029	949-313-5029 csimon@bergerkahn.com
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	Lauren.macksoud@dentons.com		212-768-5347	10020-1089	YW	New York		Americas	Attn: Lauren Macksoud	Dentons US LLP	Counsel for Capital Power Corporation and
e.	4 John.moe@dentors.com	213-623-9924	213-623-9300	90017-5704	S	Los Angeles	Sulte 2500	601 S. Figueroa Street	Attn: John A. Moe, II	Dentons US LLP	Counsel for Capital Power Corporation and Halklirk I
10		404-527-4198	404-527-4073	30308	GA	Atlanta		5300 S300	Attn: Bryan E. Bates, Esq.	Dentons US LLP	oursel to Southwire Company LLC
				94558	2	Napa	Suite 201	1339 Pearl Street	Attn: Karl Knight	Debra Grassgreen	Creditor and Counsel to Debra Grasspreen
3008	_	212-701-5331	212-450 4331	10017	ΝΥ	New York		450 Lexington Avenue	Attn: Eli J. Vonnegut, David Schiff, Trmothy Graulich	Paris police Mandwell III	Counsel for the agent under the Debtor's proposed debtor in possession financing facilities, Counsel for Citibank N.A., as Administrative Agent for the Utility
20	1 andrew.yaphe@davispolk.com	650-752-2111	650-752-2000	94025	S	Menio Park		1600 El Comino Real	Attn: Andrew D. Yaphe	Davis Polk & Wardwell LLP	Counsel for Otlbank N.A., as Administrative Agent for the Utility Revolving Credit Facility
	_	650-394-8672	650-453-3600	94065	S	Redwood Shore	Suite 145	333 Twin Dolphin Drive	Attn: Michael S. Danko, Kristine K Meredith, Shawn R. Miller	DANKO MEREDITH	Councel for Fire Victim Creditors
	mdanko@dankolaw.com					1000	Zout Floor	3 Embarcadero center	Attn: Thomas F. Koegel	Crowell & Moring LLP	Counsel for Creditors and Parties-in-Interest NEXANT
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	-	202-628-5116	202-624-2500	20004	3 8	Washington		N.W.	Attn: Monique D. Almy	Crowell & Maring LLP	col for Craditors and Parties-in-Interest NEXANT
4		202-628-5116			5	Sell File Inches		1001 Pennsylvania Avenue,	Mullan	Crowell & Moring LLP	Counsel to Renaissance Reinsurance LTD,
	-	415-986-2827	415-986-2800	94111	2	5000000		Three Embarcadero Center,	Attn: Mark D. Plevin, Brendan V.	COONTROL	Counsel for Valley Clean Energy Alliance
		230-000-0273	530-666-8278	95695	S	Woodland	Room 201	625 Court Street	Attn: Fric May	County of Sonoma	
	Tambra.curtis@sonoma-county.org	670.666.8379	707-565-2421	95403	S	Santa Rosa	575 Administration Drive, Room 105A	County Administration	Atta: Tambra Curtis	Cotchett, Pitre & Mccartny, LLP	- 1
-ilod: (fpltre@cpmlegal.com acordova@cpmlegal.com ablodgett@cpmlegal.com	650-697-0577	650-697-6000	94010	S	Burlingame	840 Malcolm Road, Suite 200	San Francisco Airport Office Center	Attn: Frank M. Pitre, Alison E. Cordova,		Counsel for Fre Wichm Creducy inclinitian Plaintiffs Executive Committee appointed by the California Superior Court in the North Bay Fire Cases, Judicial Council Coordination Proceeding Number 4955, Pursuant to the terms of the Court's
0 111		850-871-4144	650-871-5666	94030-0669	S	Milbrae	PO Box 669	700 El Camino Real	Attn: Dario de Ghetaldi, Amanda L Riddle, Steven M. Berkl, Sumble Manzoor	CORFY LUZAICH, DE GHETALDI & RIDDLE LLP	
=/10	pcalifano@cuclaw.com deg@coreylaw.com	415-433-5530	415-433-1900	94111	S	San Francisco		201 California Street, 17th Floor	Attn: Peter C. Califano	Cooper, White & Cooper LLP	IAS DE VICE. Courses for Gowan Construction Company Inc., Calaveras Telephone Company, Kerman Telephone Co., Plinaclas Telephone Co., The Ponderosa Telephone Co., Sierra Telephone Company, Inc., Volcano Telephone Company and TOS Telecom
	19-11-Octo-Danacopic sourcepains	717-787-7571	717-787-7627	17121	PA	Harrisburg	702	Collections Support Unit	Department of Labor and Industry	Commonwealth of Pennsylvania	
			0002-002-212	100006	NY	New York	651 Boas Street, Room	One Liberty Plaza	Schlerberl	Cleary Gordleb Sheen & Hamilton LLP	Counsel for BlueMountain Capital Management, LLC
	_	212-225-3999	212-255-2000	0005				_	Attn: Michael W. Goodin Attn: Lisa Schweltzer, Margaret	Clausen Miller P.C.	1
0.4/4/	mgoodin@clausen.com	949-260-3190	949-260-3100	92614	2	tvine	Suite 650	17901 Von Karman Avenue	Arra- Michael W. Goodin		B B
	kwinick@clarktrev.com	213-624-9441	213-629-5700	90017	8	Los Angeles	12th Floor	800 Wilshire Boulevard	Attn: Kimberly S. Winick		lifornia Community Choice
	marmstrong@chevron.com	_		94583	S	San Ramon	72110	6001 Bollinger Canyon Road	Attn: Melanie Cruz, M. Armstrong	OF CHEVRON U.S.A. INC.	y, a division of
4	melaniecruz@chevron.com	_	140 100 1000	70765	2	San Francisco		505 Van Ness Avenue	Attn: Arocles Aguilar		affornia Public Utilities Commission
	vbantnerpeo@buchalter.com arocles.aguilar@cpuc.ca.gov	415-227-0770	415-227-0900	94105-3493	S	San Francisco	17th Floor		Attn: Valerie Bantner Peo, Shawn M. Christianson	and Corporation	y Choice Association,
	grougeau@brlawsf.com schristianson@buchalter.com		415-992-8940	94104	S	San Francisco	Suite 410	235 Montgomery Street S	Attn: Gregory A. Rougeau	ē	inc. dba Kortick
05	mlsola@brotherssmlthlaw.com	925-944-9701	925-944-9700	94596	S	Walnut Creek	Suite 720	2033 N. Main Street S	Attn: Mark V. Isola		Directional
	bletsch@braytonlaw.com	415-898-1247	415-898-1555	94948-6169	S	Novato	69	g Road	Attn: Alan R. Brayton, Esq. and Bryn G. Letsch, Esq.	ETTTP	lean Power Authority ounsel to unsecured asbestos personal injury Bertron Evacett Freeman Waining Jr. B
	mgorton@boutinjones.com			95814	8	Sacramento	Suite 1500		Attn: Mark Gorton	Boutin lones Inc	d Party-in-Interest Sonoma
ge	Heinz@bindermalter.com	408-295-1531 H	408-295-1700	95050	Ŝ	Santa Clara		2775 Park Avenue	Attn: Michael W. Malter, Robert G. Harris, Heinz Binder		argePoint, Inc., Counsel to Almendarlz

Master Service List Case No. 19-30088

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alex.sher@hoganlovells.com	717.018.3100				and an other states	Suite 1-900	1999 Avenue of the stars	Attn: Bennett L. Spiegel	HOGAN LOVELLS US LLP	Counsel for McKinsey & Company, Inc. U.S.
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In re: PG&E Corporation, et al. Master Service List Case No. 19-30088

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